

Attorneys for Plaintiffs

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER LUNDGREN,

Plaintiff,

07 Civ. 4534 (WP4)

-against-

SEAN G. JULIUS, SHARON L. DAVIS,
LICARE CORPORATION d/b/a
VACCARO'S WINE & SPIRITS, and
JOHN DOES 1-10,

Defendants.

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PLAINTIFF'S INTERROGATORIES DIRECTED TO DEFENDANTS JULIS AND DAVIS

Plaintiff Jennifer Lundgren, by her attorneys, Baker, Leshko, Saline & Blosser, LLP, hereby requests that defendants Julius and Davis respond to the following interrogatories in accordance with the Federal Rules of Civil Procedure:

1. Please state:

(a) The name and address of the person or persons answering these interrogatories;

ANSWER:

Please state: Defendants' full name and address, his age and date of birth and his or her present address. Please also state the name and address of defendants' employer.

ANSWER:

Are you aware of any statement made by plaintiff (or its employees) regarding the occurrence mentioned in the complaint , whether oral, written, or recorded in any way, including but not limited to, a stenographic, mechanical, electrical, audio, video, motion picture, photograph, or other recording, or transcription thereof, and if so, and please attach an exact copy of the original of said statement, interview, report, film or tape to your answers to these interrogatories; if oral, please state verbatim the contents thereof.

ANSWER:

State whether there exists photographs, videotapes, or movies with respect to the automobiles or scene of the occurrence mentioned in the petition. If so, state the following:

- (a) Describe each photograph, video, or movie;
- (b) State the date each was taken;
- (c) State the name and address of the person taking each such photo, video, or movie; and,
- (d) State the name and address, employer, insurer, and job title of the person presently having control or custody of each photograph, video or movie.

ANSWER:

List and identify:

- (a) Each person this defendant expects to call as an expert witness at the trial, whether the witness is a retained expert or non-retained expert, stating for each such expert:
 - (i) Name;
 - (ii) Address;
 - (iii) Occupation;
 - (iv) Place of employment;
 - (v) Qualifications to give an opinion (if such information is available on an expert's curriculum vitae, you may attach a copy thereof in lieu of answering this interrogatory subpart); and,
- (b) With respect to each expert listed, please state the subject matter on which the expert is expected to testify and the expert's hourly deposition fee.

ANSWER:

6. Witnesses:

State the names and addresses of every person known by defendant, defendant's representatives or defendant's attorney, to have witnessed the occurrence mentioned in the petition, or who was present at the scene within sixty minutes of the occurrence. Designate which of such people actually claim to have witnessed the occurrence..

ANSWER:

State whether defendant has ever pleaded guilty to or has ever been convicted of a felony or misdemeanor, (State or Federal) and if your answer is in the affirmative, please state:

- (a) The date of any such plea or conviction;
- (b) The state and county where said plea or conviction occurred; and,
- (c) The offense for which defendant pled guilty or was convicted.

ANSWER:

State where defendant was coming from and the place of defendant's destination at the time of the collision in question.

ANSWER:

- (a) State the name and address of any and all registered or equitable owners of the vehicle being operated by defendant at the time of the occurrence in question.
- (b) State whether repair estimates were obtained or the vehicle was repaired, and if so, please state the amounts of any estimates and/or repair costs and the names and addresses of each person or company who prepared an estimate or repaired the vehicle.

ANSWER:

State whether defendant or defendant's representatives was/were convicted of or pleaded guilty to any violation arising out of the collision in question, and if so, state the charges to which such person was convicted or pled guilty, the name and address of the court where same occurred, the date of final disposition, and the cause number for each such plea or conviction.

ANSWER:

State whether or not any insurance company (including any company with excess or umbrella coverage) has an interest in the outcome of this litigation against defendant. If so, state the following:

- (a) The name of the insurance company;
- (b) Whether the insurance company is a stock company or a mutual company;
- (c) Name of the insured;
- (d) Type(s) of insurance;
- (e) Effective policy period;
- (f) Policy number;
- (g) Limits of the policy applicable to the occurrence mentioned in these pleadings; and,
- (h) Whether the policy provides for medical payments coverage, and if so, the amount of coverage.

ANSWER:

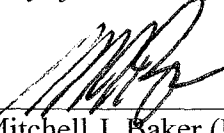
State whether the defendant consumed alcoholic beverages, medication, or prescription or non-prescription drugs within a ten (10) hour period prior to the collision in question, and if so, state the names and addresses of the places where said alcoholic beverages, medication or drugs were consumed and described the quantity and type of drinks, medication or drugs which were consumed in said period of time.

ANSWER:

State whether a claim is made that there was a mechanically defective condition or mechanical failure of the vehicle being operated by defendant at the time of the collision in question which contributed to cause the collision in question and if so, state the nature of said mechanically defective condition of the vehicle and what actually occurred to contribute to the cause of the accident in question.

ANSWER:

BAKER LESHKO SALINE & BLOSSER LLP
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